

EXPLANATORY STATEMENT

Row 44, Inc., pursuant to Section 25.120(b) of the FCC's Rules, hereby requests Special Temporary Authority ("STA") for an additional thirty (30) days to operate its licensed Ku-band network of Earth Stations Aboard Aircraft ("ESAA") (Call Sign E080100), using space segment capacity on the SES, S.A. ("SES") AMC-6 satellite ("AMC-6") at 72° W.L. The capacity on AMC-6 is being used on an interim basis as replacement capacity for space segment on the AMC-2 satellite, which is in the process of being relocated from 80.85° W.L. to 84.85° W.L. Row 44 expects to transition back to AMC-2 once it is on station and operating at its new location. It has now filed an amendment (FCC File No. SES-AFS-20160614-00506) to its pending modification application (FCC File No. SES-MFS-20150928-00635) to shift its authority to operate on AMC-2 to the new orbital location, and expects to file for STA to operate using AMC-2 at 84.85° W.L. in the near future.

Row 44 has been transmitting to AMC-6 since May 23, 2016 without causing any interference into adjacent satellites operating in accordance with FCC's two-degree spacing policy. It has previously provided a coordination certification letter from SES, in accordance with Sections 25.227(b)(2) of the Commission's Rules, covering the interim operation, which is also fully consistent with its coordination agreements with the National Science Foundation and the National Aeronautics and Space Administration.

Under Section 25.120(b)(1) of the FCC's Rules, the International Bureau may grant an STA when the public interest supports the relief requested, and/or delay in the institution of temporary operations would be contrary to the public interest. *See* 47 C.F.R. § 25.120(b)(1). Such authority may be granted for a period not to exceed 30 days "if the STA request has not been placed on public notice, and an application for regular authority is not contemplated." *See* 47 C.F.R. § 25.120(b)(4). Because Row 44 will not be filing an application for permanent access to AMC-6 at 72° W.L., its request is thus limited to thirty (30) days duration. Row 44 anticipates that operations using AMC-6 will continue for just a few more weeks, which may mean that no further STA extensions will be required.

Grant of the additional authority requested here will promote the public interest by permitting Row 44 to continue providing service to its customers using capacity on the AMC-6 satellite in lieu of capacity on AMC-2. Use of AMC-6 will help maintain effective coverage of all U.S. domestic routes currently served by Row 44. Grant of the requested STA is consistent with Commission policy and will not adversely affect other authorized operations. Row 44 acknowledges that any action taken pursuant to a grant of the requested STA will be at its own risk, and respectfully requests that the FCC grant it authority as of June 22, 2016, for an additional period of thirty (30) days, to use the AMC-6 satellite as a point of communication in the conventional Ku-band in the United States using TECOM antennas now operating under its FCC ESAA network license.